

1 Konrad L. Trope, Esq. SBN 133214
 2 **Novo Law Group, P.C.**
 3 4631 Teller Avenue, Suite 140
 4 Newport Beach, California 92660
 5 (949) 222-0899 (tel)
 6 (949) 222-0983 (fax)

7 Attorneys for Plaintiff Pacific Information Resources, Inc.

8
 9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 Pacific Information Resources, Inc., a
 13 California Corporation,

14 Plaintiff,

15 vs.

16 SIMPLE COMMUNICATIONS, an Alabama
 17 corporation; WILLIAM TRAVIS SULLIVAN,
 18 individually, AND DOES 1 through 100,
 19 inclusive, WHOSE IDENTITIES ARE
 20 UNKNOWN,

21 Defendants.

22) **CASE NO. CV-07-4131 MMC**
 23)
 24) **[Before the Honorable Maxine M.**
 25) **Chesney, Courtroom 7]**
 26)
 27) **PLAINTIFF'S REQUEST TO**
 28) **CONTINUE DATE FOR FILING**
 29) **MOTION FOR DEFAULT JUDGMENT**
 30) **AGAINST WILLIAM TRAVIS**
 31) **SULLIVAN AND SIMPLE**
 32) **COMMUNICATIONS; ORDER THEREON**
 33)
 34) Complaint Filed: August 9, 2007
 35) Discovery Cut-Off: N/A
 36) Trial: N/A
 37) Status Conference: February 8, 2008

38
 39 **TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR**
 40 **ATTORNEYS OF RECORD HEREIN:**

41 Plaintiff Pacific Information Resources, Inc. ("Plaintiff") hereby requests a continuance
 42 of the Court to file its Default Judgment Application on Wednesday, February 27, 2008, instead
 43 of on February 22, 2008. Plaintiff makes this request on the basis of good cause:

44 1. Extrapolating the voluminous data necessary to support the Default Judgement
 45 has *exceeded all expectations. The initial report, finally received, indicates*

damages in excess of \$15 million! Counsel for Plaintiff wants to be certain that the analysis is solid and will sustain any review by the court. and

4. One of Plaintiff's experts, Professor Ran Hadas, is teaching and researching at the University of Sydney in Australia until July, 2008. Thus, coordinating with Professor Hadas has been an extremely time consuming and logistical challenge.

Plaintiff's counsel humbly apologizes to the Court and begs the Court's indulgence this one last time. Plaintiff's counsel has three motions for Summary Judgment to file with this honorable court on March 21 in a related case. Thus, Plaintiff's counsel is thus quite desirous and confident of completing this default application on February 27.

There will be no prejudice to any party who has direct or related interest in this case, including those parties who are Defendants in the related case noted herein.

Respectfully submitted,

DATED: February 22, 2008

NOVO LAW GROUP, P.C.

BY: /s/Konrad L. Trope, Esq.
California State Bar No. 133214
Novo Law Group, P.C.
4631 Teller Avenue, Ste 140
Newport Beach, California 92660
Telephone: (949) 222-0899
Facsimile: (949) 222-0983
E-mail: ktrrophe@novolaw.com
Attorneys for Plaintiff PACIFIC
INFORMATION RESOURCES,
INC.

~~[PROPOSED]~~ ORDER

Plaintiff Pacific Information Resources has hereby requested continuance to file its
Defaults Judgment Application against Defendants William Travis Sullivan and Simple
Communications to February 27, 2008.

1 Having considered the requested extension, good cause appearing, therefore, and no
2 prejudice any parties appearing, IT IS HEREBY ORDERED that:

3 Plaintiff shall file its Application for Default Judgment not later than February 27, 2008.

4 Dated: February 26, 2008


5 Honorable MAXINE M. CHAY
6 United States District Judge